

ALSTON & BIRD LLP

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Jeremy Tucker

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July 19, 2007

VIA FIRST-CLASS MAIL

Crystal M. James
8451 S. Cherokee Blvd.
Suite F
Douglasville, GA 30134

Re: *Lampkin v. UPS*, Case No. 1:06-CV-538-WKW, U.S. District Court for
the Middle District of Alabama.


Dear Ms. James,

We would like to schedule Ms. Lampkin's deposition in the next few weeks. Please let me know which of the following dates are convenient for you: August 7, 8, 9, 14, 15, 16, 21, 22, 23, 24.

Also, we served UPS's first interrogatories and document requests on June 13, 2007. Ms. Lampkin's responses were due to be served by July 16, 2007, but we have not yet received them. Please forward those responses, as well as copies of the 14 categories of documents listed on Exhibit C to Ms. Lampkin's Initial Disclosures, to me at your earliest convenience.

Thank you for your assistance with these discovery matters. I look forward to hearing from you soon.

Sincerely,



Jeremy Tucker

JT:jt

cc: Lisa H. Cassilly

LEGAL02/30453182v1

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July 30, 2007

VIA U.S. MAIL and
FACSIMILE (770-489-5602)

Crystal M. James
Crystal James & Associates, LLC
8451 South Cherokee Boulevard
Suite F
Douglasville, Georgia 30309

Re: *Tracy Debose Lampkin v. United Parcel Service, Inc.*; Civil Action No.
1:06-CV-538-WKW

Dear Ms. James:

As you know, the deadline for service of Ms. Lampkin's responses to UPS's discovery requests was July 16, 2007. I sent you a letter dated July 19, 2007 requesting Ms. Lampkin's discovery responses and responsive documents as soon as possible and proposing several dates in August for Ms. Lampkin's deposition.¹ Ms. Kimberly Grigsby of your office left a voice message for Mark DeLoach on July 27, 2007 requesting additional time to provide Ms. Lampkin's responses. I returned Ms. Grigsby's call and left her a voice message on July 27, 2007. Ms. Grigsby then left me another voice message and faxed me a letter on Saturday, July 28, 2007. In her letter, Ms. Grigsby asked for an extension to August 16, 2007 to provide Ms. Lampkin's discovery responses and proposed August 23, 2007 as the date for Ms. Lampkin's deposition. I returned Ms. Grigsby's call today, but was informed by the receptionist that Ms. Grigsby is out of the office until August 13, 2007.

We are agreeable to an extension of time for Ms. Lampkin to provide us with her discovery responses and believe that extending the deadline to August 10, 2007 is reasonable, so long as Ms. Lampkin produces responsive documents to us by August 10 as well. Such an extension would represent almost four weeks since the original July 16

¹ Mark DeLoach, a former associate at my firm, sent you a letter dated June 15, 2007 indicating that I had taken over the case for him and requesting available dates for Ms. Lampkin's deposition.

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Crystal M. James

July 30, 2007

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deadline. The discovery period in this case ends soon, and as indicated in our prior letters to you, we need Ms. Lampkin's discovery responses and documents before her deposition. Thus, please provide Ms. Lampkin's discovery responses and responsive documents (including the documents listed on Exhibit C to her Initial Disclosures) by August 10, 2007.

As for Ms. Lampkin's deposition, I have a court hearing in Alabama on August 23, 2007 and cannot conduct the deposition on that date. Please let me know if any days during the week of August 27, 2007 are convenient for Ms. Lampkin as that week is currently open for me. If that week is not convenient, please provide other dates when Ms. Lampkin is available. Given the fast-approaching discovery deadline, we obviously need to schedule Ms. Lampkin's deposition as soon as possible.

Thank you for your attention to these matters. I look forward to hearing from you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Tucker", with a stylized, cursive script.

Jeremy Tucker

JT:jt

cc: Lisa Cassilly

LEGAL02/30468083v1

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August 27, 2007

VIA U.S. MAIL &
FACSIMILE (770-489-5602)

Crystal M. James
Crystal James & Associates, LLC
8451 South Cherokee Boulevard
Suite F
Douglasville, Georgia 30134


Re: *Tracy Debose Lampkin v. United Parcel Service, Inc.*; Civil Action No.
1:06-CV-538-WKW

Dear Ms. James:

By letter dated July 30, 2007, we agreed to extend Plaintiff's deadline to provide responses to UPS's discovery requests to August 10, 2007. Plaintiff's responses were originally due on July 16, 2007. Despite assurances from your staff over two weeks ago that responses and documents were forthcoming, we still have not received Plaintiff's responses to UPS's discovery requests or any documents from Plaintiff as of this date.

We will proceed with Plaintiff's deposition on August 30, 2007 as scheduled, but we may have to continue the deposition beyond that date because of Plaintiff's delay in providing her discovery responses. Please contact me if you would like to discuss this matter.

Sincerely,



Jeremy Tucker

JT:jt
cc: Lisa Cassilly

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September 24, 2007

VIA U.S. MAIL &
FACSIMILE (770-489-5602)

Crystal M. James
Crystal James & Associates, LLC
8451 South Cherokee Boulevard
Suite F
Douglasville, Georgia 30134

Re: *Tracy Debose Lampkin v. United Parcel Service, Inc.*; Civil Action No.
1:06-CV-538-WKW

Dear Ms. James:

We still have not received Ms. Lampkin's responses to UPS's first interrogatories and first requests for production of documents, which were due, pursuant to our agreed upon extension of time, on August 10, 2007. We requested and received on August 29, 2007, the day before Ms. Lampkin's deposition, a few of the documents identified in Ms. Lampkin's Initial Disclosures, but have not received the other documents or Ms. Lampkin's written discovery responses. As you know, Ms. Lampkin testified in her deposition that she had many documents in her possession and that she would be giving you those documents. We have not received any documents since Ms. Lampkin's deposition.

We do not want to trouble the Court with this discovery matter, but will be forced to do so if we do not receive Ms. Lampkin's discovery responses and documents that we have been trying to obtain for several months. Please provide us with Ms. Lampkin's discovery responses and documents by October 1, 2007 so that we may move forward with discovery and avoid having to file a motion to compel with the Court. Thank you for your prompt consideration of

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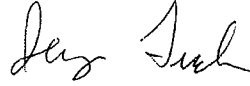
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Crystal M. James
September 24, 2007
Page 2

this matter, and please contact me if you would like to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Tucker". The signature is fluid and cursive, with the first name "Jeremy" and last name "Tucker" clearly distinguishable.

Jeremy Tucker

JT:jt
cc: Lisa Cassilly

LEGAL02/30538162v1

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October 12, 2007

VIA U.S. MAIL &
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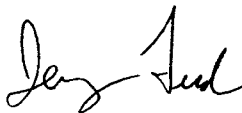
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Douglasville, Georgia 30134

Re: *Tracy Debose Lampkin v. United Parcel Service, Inc.*; Civil Action No.
1:06-CV-538-WKW

Dear Ms. James:

Despite numerous assurances from you and your staff, we still have not received Ms. Lampkin's responses to UPS's first interrogatories and first requests for production of documents or the documents that have been promised us for weeks. If we do not receive these items next week, we will have no choice but to file a motion to compel with the Court. We would appreciate your assistance in this matter.

Sincerely,



Jeremy Tucker

JT:jt
cc: Lisa Cassilly

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